

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION

No. 2:12-md-02323-AB

MDL No. 2323

Kevin Turner and Shawn Wooden,
*on behalf of themselves and
others similarly situated,*
Plaintiffs,

v.

Civ. Action No.: 14-cv-00029-AB

National Football League and
NFL Properties, LLC,
successor-in-interest to
NFL Properties, Inc.,
Defendants.

THIS DOCUMENT RELATES TO:
ALL ACTIONS

**APPLICATION BY CO-LEAD CLASS COUNSEL FOR
APPROVAL OF THE CONTENTS AND FOR THE DISSEMINATION OF THE
SETTLEMENT CLASS SUPPLEMENTAL NOTICE PACKAGE
AND PROPOSED ORDER¹**

Co-Lead Class Counsel submits for review and approval the contents of the Settlement Class Supplemental Notice package that is to be disseminated to the Settlement Class pursuant to Section 14.1(d) of the Settlement Agreement. As proposed, the Settlement Class Supplemental Notice package will include a cover page, the hard-copy Registration Form, and a Supplemental Notice.

A copy of the proposed cover page is attached hereto as Exhibit "A".

¹ Unless otherwise noted, the terms used in this Order that are defined in the Settlement Agreement have the same meanings in this Order as in the Settlement Agreement.

A copy of the proposed Registration Form is attached hereto as Exhibit "B".

A copy of the proposed Supplemental Notice is attached hereto as Exhibit "C".

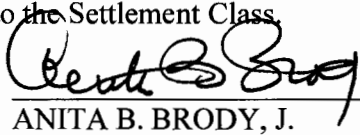
Co-Lead Class Counsel requests that the content of each of these documents be approved for dissemination to the Settlement Class

Dated: January 30, 2017

/s/ Christopher Seeger
Christopher Seeger
SEGER WEISS LLP
77 Water Street
New York, NY 10005
Phone: (212) 584-0700
cseeger@seegerweiss.com

Co-Lead Class Counsel

It is so **ORDERED**, this 31st day of January, 2017, that the contents of the Settlement Class Supplemental Notice package are **APPROVED** and that the Settlement Class Supplemental Notice may be disseminated to the Settlement Class.


ANITA B. BRODY, J.

Copies **VIA ECF** on _____ to:

Copies **MAILED** on _____ to:

NFL Concussion Settlement Registration Instructions

**TO RECEIVE ANY BENEFITS YOU MUST
REGISTER ON OR BEFORE
AUGUST 7, 2017***

Registration is the first step and should be your top priority.

- The best method to register is online. Go to the settlement website at www.NFLConcussionSettlement.com, click REGISTER NOW, and follow the instructions.
- If online registration is inconvenient for you, you can fill out the attached registration form and send it by:

U.S. Mail

NFL Concussion Settlement
Claims Administrator
P.O. Box 25369
Richmond, VA 23260

OR

FedEx or UPS

NFL Concussion Settlement
c/o BrownGreer PLC
250 Rocketts Way
Richmond, VA 23231

**YOU MUST REGISTER, EVEN IF YOU HAVE
ALREADY “SIGNED UP” FOR MORE INFORMATION**

IF YOU HAVE ANY QUESTIONS OR NEED HELP REGISTERING:

CALL 1-855-887-3485

OR EMAIL ClaimsAdministrator@NFLConcussionSettlement.com

OR VISIT www.NFLConcussionSettlement.com

*If you are a Derivative Claimant, NOT a Retired Player or a Representative of a Retired Player, then you may have additional time to register. See the long-form registration notice or visit www.NFLConcussionSettlement.com.

REGISTRATION FORM

SECTION II — FOR RETIRED NFL FOOTBALL PLAYER CLAIMANTS ONLY

If you are a Retired NFL Football Player, complete this section. If you are NOT a Retired NFL Football Player, skip this section and go to Section III.

Settlement Program ID
(if known)

Your Mailing Address

Address 1

Address 2

City

State/Province

Postal Code

Country

Your Telephone Number

|_|_|_|_| - |_|_|_|_| - |_|_|_|_|_|

Your Email Address

Preferred Method for Us to Communicate with You

☐

Online Portal

☐

Email

☐

U.S. Mail

CONTINUE TO PAGE 3

REGISTRATION FORM**SECTION III — FOR REPRESENTATIVE CLAIMANTS ONLY**

If you are a Representative Claimant, complete this section. If you are NOT a Representative Claimant, skip this section and go to Section IV.

A Representative Claimant is an authorized representative, ordered by a court or other official of competent jurisdiction under applicable state law, of a deceased or legally incapacitated or incompetent Retired NFL Football Player.

Settlement Program ID
(if known)

Your Name

First

M.I.

Last

Suffix

Your Mailing Address

Address 1

Address 2

City

State/Province

Postal Code

Country

Your Telephone Number

|_|_|_|_| - |_|_|_|_| - |_|_|_|_|_|

Your Email Address

Preferred Method for Us to Communicate with You

☐

Online Portal

☐

Email

☐

U.S. Mail

Is the Retired NFL Football Player for whom you are acting deceased or legally incapacitated or incompetent?

☐

Deceased

☐

Legally Incapacitated or Incompetent

Date of Death
(if applicable)

|_|_|_|/|_|_|/|_|_|_|_|
(Month/Day/Year)

Retired NFL Football Player's Last Known State of Residence

|_|_|_|

Note to Representative Claimants:

Along with this Registration Form, YOU MUST SUBMIT a copy of the court order or other document issued by an official of competent jurisdiction that gives you legal authority to act on behalf of the deceased or legally incapacitated or incompetent Retired NFL Football Player.

If you have not yet been ordered by a court or other official of competent jurisdiction to be the authorized representative of the deceased or legally incapacitated or incompetent Retired NFL Football Player before the Registration deadline, you may request a deadline extension to submit your Registration Form by: (1) using your secure online portal; or (2) writing to the NFL Concussion Settlement Claims Administrator, P.O. Box 25369, Richmond, VA 23260.

CONTINUE TO PAGE 4

REGISTRATION FORM**SECTION IV — FOR DERIVATIVE CLAIMANTS ONLY**

If you are a Derivative Claimant, complete this section. If you are NOT a Derivative Claimant, skip this section and go to Section V.

A Derivative Claimant is a spouse, parent, child who is a dependent, or any other person who properly under applicable state law asserts the right to sue independently or derivatively by reason of their relationship with a Retired NFL Football Player.

Settlement Program ID
(if known)

Your Name

First

M.I.

Last

Suffix

Your Mailing Address

Address 1

Address 2

City

State/Province

Postal Code

Country

Your Telephone Number

|_|_|_| - |_|_|_| - |_|_|_|_|

Your Email Address

Preferred Method for Us to Communicate with You

☐ Online Portal

☐ Email

☐ U.S. Mail

What is your relationship to the Retired NFL Football Player?

CONTINUE TO PAGE 5

REGISTRATION FORM

SECTION V — ATTORNEY INFORMATION FOR ALL REGISTRANTS

If an attorney is representing you in connection with the NFL Concussion Settlement, complete this section. If an attorney is NOT representing you in connection with the NFL Concussion Settlement, skip this section and go to Section VI.

Attorney Name	First	M.I.	Last	Suffix
Law Firm Name				
Attorney Mailing Address	Address 1			
	Address 2			
	City			
	State/Province			
	Postal Code	Country		
Attorney Telephone	<div style="display: flex; justify-content: space-between;"> <div> <div></div><div></div><div></div><div></div> </div> <div>-</div> <div> <div></div><div></div><div></div><div></div> </div> <div>-</div> <div> <div></div><div></div><div></div><div></div> </div> </div>			
Attorney Fax	<div style="display: flex; justify-content: space-between;"> <div> <div></div><div></div><div></div><div></div> </div> <div>-</div> <div> <div></div><div></div><div></div><div></div> </div> <div>-</div> <div> <div></div><div></div><div></div><div></div> </div> </div>			
Attorney Email Address				

All future communications related to the NFL Concussion Settlement will be directed to your attorney.

CONTINUE TO PAGE 6

REGISTRATION FORM**SECTION VI — SIGNATURE
FOR ALL REGISTRANTS**

This Form is an official document submitted in connection with the Class Action Settlement in *In re: National Football League Players' Concussion Injury Litigation*, No. 2:12-md-2323 (E.D. Pa.). **By signing below, I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that all information provided in this Registration Form is true and correct to the best of my knowledge, information and belief.**

Signature				Date	_ / _ / _ _ _ _ _ _ _ _ _ _ _ _ (Month/Day/Year)		
Printed Name	First	M.I.	Last			Suffix	

SECTION VII — HOW TO SUBMIT THIS REGISTRATION FORM

By Email:	ClaimsAdministrator@NFLConcussionSettlement.com
By Mail:	NFL Concussion Settlement Claims Administrator P.O. Box 25369 Richmond, VA 23260
By Delivery: (FedEx, UPS, etc.)	NFL Concussion Settlement c/o BrownGreer PLC 250 Rocketts Way Richmond, VA 23231

If you are a valid Settlement Class Member you will be REGISTERED once you submit this form. The Claims Administrator will contact you if there are any additional questions about the information you have provided.

END OF REGISTRATION FORM

NFL Concussion Settlement Update

YOU CAN NOW REGISTER TO PARTICIPATE IN THE SETTLEMENT

YOU MUST REGISTER BY AUGUST 7, 2017

A federal court authorized this Notice. This is not a solicitation from a lawyer.

HOW TO REGISTER FOR BENEFITS

How do I register for Settlement benefits?

Settlement Class Members must register by August 7, 2017. You can register online, or mail or by email a completed Registration Form to the Claims Administration.

You can register online now. Go to the settlement website at www.NFLConcussionSettlement.com, click REGISTER NOW, and follow the instructions provided on the screen.

You can register by mail. You can download and print a Registration Form by clicking the Registration Form link on the settlement website. You can also request a paper Registration Form by calling 1-855-887-3485, emailing ClaimsAdministrator@NFLConcussionSettlement.com, or writing to NFL Concussion Settlement, P.O. Box 25369, Richmond, VA 23260. Instructions will be provided with the Registration Form.

You must complete your registration on the settlement website or submit your paper Registration Form by emailing it to ClaimsAdministrator@NFLConcussionSettlement.com or mailing it to NFL Concussion Settlement, P.O. Box 25369, Richmond, VA 23260, on or before **August 7, 2017**. Derivative Claimants may register within 30 days of the Retired NFL Football Player's submission of a Claim Package, but all Settlement Class Members should register as soon as possible.

IF YOU DO NOT REGISTER, You Will Not Be Able To Participate In The Baseline Assessment Program Or Receive Monetary Awards Or Derivative Claimant Awards From This Settlement.

Even if you already signed up to receive future information or updates, you must still register.

If you are not sure whether you should register, you may call 1-855-887-3485; write to NFL Concussion Settlement, P.O. Box 25369, Richmond, VA 23260; or email ClaimsAdministrator@NFLConcussionSettlement.com with questions; or visit www.NFLConcussionSettlement.com.

Does registering mean I filed a claim?

No. Registering does not mean that you filed a claim for a Monetary Award or Derivative Claimant Award. Successful registration only means that you are eligible to file a claim and potentially receive Settlement benefits. You must register before you can participate in the Baseline Assessment Program ("BAP") and/or file a claim for a Monetary Award or Derivative Claimant Award. If you do not register, you will not be

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eligible for any of the Settlement benefits. A full description of the Settlement benefits is available at www.NFLConcussionSettlement.com.

What happens after I register?

If you are a valid member of the Settlement Class, you will be registered. The Claims Administrator will contact you if there are any additional questions about the information you have provided. You can expect to receive additional information on how to participate in the BAP (for eligible retired players) and submit a claim for a Monetary Award or Derivative Claimant Award. If your registration is not approved, you will have the opportunity to challenge the determination to the Claims Administrator. If that challenge is denied, you may appeal that decision to the Special Master.

DEADLINES FOR REGISTRATION AND BENEFITS

PARTICIPATION IN THE SETTLEMENT PROGRAM		
	<u>SUMMARY</u>	<u>DEADLINE</u>
REGISTER	To receive any benefits from the Settlement, you need to register at www.NFLConcussionSettlement.com or submit a paper Registration Form to the Claims Administrator.	August 7, 2017 Derivative Claimants may also register within 30 days after their Retired NFL Football Player submits a claim for a Monetary Award.
PARTICIPATE IN BASELINE ASSESSMENT PROGRAM (IF ELIGIBLE)	After you register, eligible retired players will be able to participate in the BAP and receive a baseline assessment examination from qualified and independent medical providers. Retired players must have at least one-half of an Eligible Season to participate in the BAP.	The deadline to participate in the BAP is tied to your age: Retired players born on or before January 7, 1974: June 6, 2019 Retired players born after January 7, 1974: June 7, 2027 or before age 45, whichever comes first.

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PARTICIPATION IN THE SETTLEMENT PROGRAM		
	<u>SUMMARY</u>	<u>DEADLINE</u>
SUBMIT CLAIM FOR MONETARY AWARD OR DERIVATIVE CLAIMANT AWARD (IF ELIGIBLE)	If the retired player receives a Qualifying Diagnosis, you must submit a Claim Package or Derivative Claim Package to receive a Monetary Award or Derivative Claimant Award.	<p>A Qualifying Diagnosis, other than Death with CTE, may be made at any time until the end of the 65-year term of the Settlement. However:</p> <p>Retired players diagnosed on or before February 6, 2017 must submit a claim by February 6, 2019; and</p> <p>Retired players diagnosed after February 6, 2017 must submit a claim within two years from the date of diagnosis.</p> <p>Derivative Claimants must submit a claim no later than 30 days after their Retired NFL Football Player or his legal representative receives notice of entitlement to a Monetary Award.</p>

GETTING MORE INFORMATION

How do I get more information?

For more information, you may:

- Call **1-855-887-3485** (between 8:00 a.m. and 8:00 p.m. Eastern Time)
- Visit **www.NFLConcussionSettlement.com**
- Email **ClaimsAdministrator@NFLConcussionSettlement.com**
- Write **NFL Concussion Settlement, P.O. Box 25369, Richmond, VA 23260**

More details are in the Amended Settlement Agreement available at **www.NFLConcussionSettlement.com**.

QUESTIONS? CALL 1-855-887-3485 OR VISIT WWW.NFLCONCUSSIONSETTLEMENT.COM

CERTIFICATE OF SERVICE

On January 30, 2017, I electronically filed the foregoing documents through the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

Dated: January 30, 2017

Respectfully submitted,

/s/ Christopher Seeger
Christopher Seeger
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Email: cseeger@seegerweiss.com

Co-Lead Class Counsel